# The Investigator as the Custodian of the Data Chain

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# Agenda

 The investigator as the custodian of the data chain.



#### **Data Chain**









Clinical Trial Data supports safe and efficacious medications for patients





## What does good look like

- A relentless attention to detail and an impeccable ability to:
  - Follow GCP
  - Carry out the **protocol precisely** as written
- An insatiable passion for
  - accurate,
  - complete, and
  - timely documentation.



# Following GCP and regulations

#### Patient safety

- Ensure IRB review and continuous approval of protocol and consent
- Obtain consent prior to any protocol procedures
- Report all adverse events

#### Data Integrity

- Create and maintain accurate source document
- Maintain study documentation and medical records
- Maintain investigational product dispostion records

#### Protocol Adherence

- Inclusion/Exclusion
- Conduct required procedures
- Administer investigational product per protocol





# Carry out protocol as written

#### Plan

- Ensure study is consistent with your practice
- Ensure adequate site infrastructure
  - e.g. SOPs
- Develop checklists

#### Improve

 Identify errors and put corrective and preventive actions in place

#### Control

- Provide study oversight
- Monitor performance



# Accurate and Complete Data

#### Accurate

- Data points in CRF must be substantiated by source documents
  - Subject diaries
  - Lab reports
  - Medical record (including electronic)
  - Worksheets

### Complete

- Solicit information about AE's from patients and report them
- Avoid "Lost to Follow-Up"





# Timely Data

- Enter data at time of visit or other event
  - Higher likelihood of accuracy and completeness
  - Minimize lag between when information is known and available to sponsor
    - Prompt data entry allows sponsor to detect safety signals as soon as possible to better protect patients



